

IN THE DRAWINGS

In the Drawings, please amend Figure 1A by the addition of reference numeral 10 as suggested in the Official Action. A replacement sheet showing the change has been attached to this paper.

REMARKS

In the Official Action, claims 20-21 were allowed, claims 12, 13, 18 and 19 were objected to, and claims 1-11 and 14-17 were rejected. Applicants thank the Examiner for allowing claims 20-21 and for indicating the allowability of claims 12, 13, 18 and 19 if rewritten in independent form to include the limitations of the base claim and any intervening claims. Independent claim 11 has been amended by adding the language of allowable dependent claim 12. Accordingly, claim 11 and its dependent claims should be in condition for allowance. In this Reply and Amendment, claims 11 and 13 have been amended; claim 12 has been canceled without prejudice; and claims 1-11 and 13-21 remain pending.

In the Official Action, the drawings were objected to as failing to comply with 37 CFR 1.84(p)(5) for not including reference numeral 10 mentioned in the description. Accordingly, Figure 1A has been amended to add reference numeral 10, and a replacement sheet has been enclosed.

Claims 1 and 7-10 were rejected under 35 U.S.C. 102(b) as anticipated by the Rickey reference, US Patent No.: 4,646,839. This rejection is respectfully traversed.

The Rickey reference discloses a system and method for through-the-flowline gravel packing. A through-the-flowline tool 25 is circulated downwardly through a flowline. The flowline tool 25 includes a central conduit 25a having first and second pistons or locomotives 25b and 25c. Tool 25 further includes an injector head 26 mounted at the lower end of conduit 25a. (See column 5, lines 8-37). The tool 25 is moved downwardly through the pipe string until injector head 26 is landed on landing nipple 27. A locking mandrel 25d is activated to lock tool 25 into a locking recess 15e. Sand slurry is then pumped downwardly through pipe string 10, through conduit 25a, and outwardly from the injector head into a perforated casing area 20. In other words, pistons 25b and 25c do not plug the flow of fluid but rather freely allow the passage of slurry to the perforated casing area 20. (See column 6, lines 1-15).

Accordingly, the Rickey reference does not disclose or teach certain elements of the subject claims, such as a plug that can be used to isolate fluids above and below the plug. By way of specific example, the Rickey reference does not disclose or suggest a "plug" that can move within the work string and in which "fluid above the plug is isolated from the fluid below the plug" as recited in independent claim 1. Because the Rickey reference does not disclose all elements of independent claim 1, the rejection should be withdrawn.

Claims 7-10 directly depend from independent claim 1. These dependent claims are patentable over the cited reference for the reasons provided above with respect to independent claim 1 as well as for the unique subject matter recited in each of the claims 7-10.

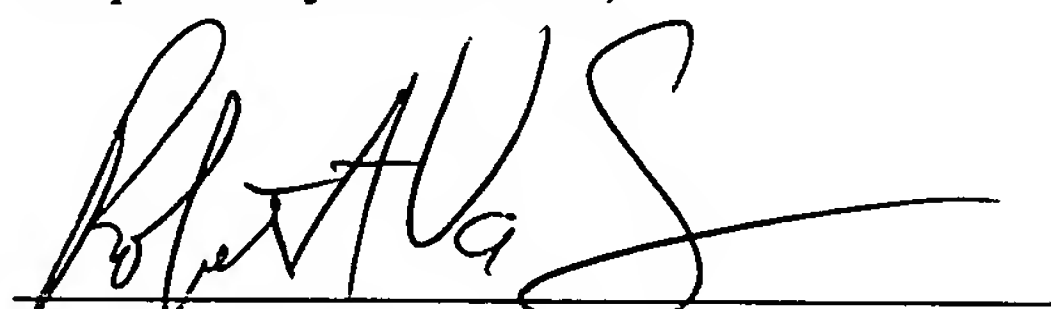
Claim 2 was rejected under 35 U.S.C. 103(a) as unpatentable over the Rickey reference in view of the Dotson reference, US Patent No.: 4,577,689. Claim 2 directly depends from independent claim 1 and is patentable over the cited references for the reasons provided above with respect to independent claim 1 as well as for the unique subject matter recited in claim 2. The Dotson reference provides no disclosure that would obviate the deficiencies of the Rickey reference.

Claims 3-6, 11, 16 and 17 were rejected under 35 U.S.C. 103(a) as unpatentable over the Rickey reference in view of the Tessier reference, US Patent No.: 6,951,246. Claim 11 has been amended to add the language of allowable claim 12. Accordingly, claim 11 and its directly dependent claims 16 and 17 should be in condition for allowance. Claims 3-6 ultimately depend from independent claim 1 and are patentable over the cited references for the reasons provided above with respect to independent claim 1 as well as for the unique subject matter recited in each of these dependent claims. The Tessier reference provides no disclosure that would obviate the deficiencies of the Rickey reference.

Claims 14 and 15 were rejected under 35 U.S.C. 103(a) as unpatentable over the Rickey reference in view of the Tessier reference, and further in view of the Dotson reference. Claims 14 and 15 ultimately depend from amended, independent claim 11 and are therefore in condition for allowance. Accordingly, the rejection should be withdrawn.

All pending claims are believed to be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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